

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

MICHELLE NELSON,

Plaintiff,

v.

RICOH USA, INC.

Case No. 2:17-cv-11390-GCS-EAS

**Hon. Judge George Caram Steeh
Magistrate Judge Elizabeth A. Stafford**

Defendant.

**AFFIDAVIT OF DEFENDANT’S COUNSEL HANNAH L. SORCIC
IN SUPPORT OF AWARD OF COSTS AND FEES**

Defendant, Ricoh USA, Inc., (“Ricoh”) by and through the undersigned counsel, files this Affidavit in furtherance of Judge Steeh’s award of costs and fees to Ricoh (Dkt. 32). Hannah L. Sorcic, being first duly sworn, deposes and says:

1. I have personal knowledge of the matters contained herein and the invoices for legal services attached, and if called as a witness, I am competent to testify to the facts set forth below.

2. I am counsel in the litigation practice group of the law firm Reed Smith LLP. I have been a member in good standing of the State Bar of Illinois since 2007. I have been admitted to U.S. District Court for the Eastern District of Michigan since 2013.

3. I am the principal attorney responsible for the representation of Ricoh in this case.

4. Other Reed Smith LLP employees, including attorneys, and local counsel have provided legal services or assistance in this case from June 2017 through the present date related to Plaintiff's failure to comply with her discovery obligations. The legal fees and costs for this time period related to enforcement of discovery obligations total \$23,597.82. This total includes the following:

\$13,933.88 – legal fees related to court contact, drafting and reviewing filings regarding Ricoh's Motion to Compel, Magistrate Judge Stafford's corresponding Report & Recommendation, and Plaintiff's various subsequent filings.

\$ 6,948.75 – legal fees related to contacting Plaintiff's counsel regarding Plaintiff's unsatisfied discovery obligations, Ricoh's Motion to Compel, Magistrate Judge Stafford's Report & Recommendation, and Plaintiff's various subsequent filings.

\$2,715.19 – costs, including fees paid to local counsel regarding Ricoh's Motion to Compel, Magistrate Judge Stafford's Report & Recommendation, and Plaintiff's various subsequent filings, and including \$991.46 in shipping and

copying Plaintiff's binders of documents. See Judge Steeh's Order (Dkt. 32, at pp. 4-6).

5. I billed 31 hours for my time and services related to the activities listed in Paragraph 4, at the hourly rate of \$441.67, for a total of \$13,691.63. Adam Weiner (Associate) billed 13.8 hours at the hourly rate of \$322.50, for a total of \$4,450.50. John McDonald (Non-Equity Partner) billed 5.8 hours at the hourly rate of \$472.50, for a total of \$2,740.50.

6. Based on my experience in the legal community and my knowledge of the rates charged by similar law firms in this area for similar litigation services, the rates charged for each of the professionals rendering services to Ricoh in this matter are reasonable and necessary.

7. The Time Entry and Cost Summaries attached to this affidavit as Exhibit 1 accurately summarize the amounts billed to this Ricoh matter for legal services performed and related costs, and they are true and accurate.

8. In preparing this affidavit, I have again examined the invoices in this matter, and the services, the time spent and the charges invoiced were reasonable and necessary under the circumstances of this case.

9. Ricoh respectfully requests the Court to enter a Monetary Judgment against Plaintiff Michelle Nelson in the amount of \$23,597.82, plus statutory interest until the Judgment is satisfied.

10. I declare that the above statements are true based upon my personal knowledge and experience.

Dated: January 24, 2018

Respectfully submitted,

Ricoh USA, Inc.

By: /s/ Hannah L. Sorcic

Hannah L. Sorcic
Adam J. Weiner
Reed Smith LLP
10 S. Wacker Drive, 40th Fl.
Chicago, IL 60606
Tel: (312) 207-1000
Fax: (312) 207-6400
hsorcic@reedsmith.com
ajweiner@reedsmith.com

and

James S. Rosenfeld (P39434)
Paul M. Mersino (P72179)
BUTZEL LONG
150 W. Jefferson Ave., Suite 100
Detroit, MI 48226
313-225-7000
rosenfeld@butzel.com
mersino@butzel.com

CERTIFICATE OF SERVICE

I hereby certify that, on January 24, 2018, I caused a copy of the foregoing to be served *via* CM/ECF on all counsel of record.

By: /s/ Hannah L. Sorcic

Hannah L. Sorcic
Reed Smith LLP
10 S. Wacker Drive, 40th Fl.
Chicago, IL 60606
Tel: (312) 207-1000
Fax: (312) 207-6400
hsorcic@reedsmith.com